

Airbag Source

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Memo

To: The Supervisor
Docket Section, NHTSA, Washington DC

From: Peter Byrne, Airbag testing Technology Inc

Date: Aug. 14, 02

Re: Docket No. NHTSA 2002-12231

Dear Sir or Madam:

I am responding to your request for comments on 49 CFR Part 541, Docket No. NHTSA 2002-12231, Federal Motor Vehicle Theft Prevention Standard, Chapter VI Rule Making Analysis and Notices, Part C, *Marking Airbags and Window Glazing*.

Airbag Testing Technology is an engineering company based in Falconer, NY, specializing in testing and certifying undeployed (salvage) OEM airbags for re-use in vehicles undergoing collision repair. We would like to comment on questions 11 and 12 in the Docket concerning the marking of airbags so as to reduce theft.

11. Marking an individual airbag module with the VIN of the vehicle into which it is being installed is very feasible.

Based on our experience, all manufacturers (i.e. vehicle manufacturers) label airbag modules with a serial number and usually a part number as well. The serial number is applied via a paper label attached to the rear surface of the module, or on the side of the unit in case there is inadequate space on the rear surface. The serial number identifies the airbag module to the vehicle maker, and it is our understanding that every vehicle record will incorporate the VIN as well as the serial number of the airbag modules installed. With safety products such as airbags, trace-ability is a key requirement in the case of defects or alleged defects.

In our opinion, marking the actual VIN of the vehicle on an additional label for the benefit of law enforcement should not pose a challenge from either a production or cost perspective. However, as you are well aware, these paper labels can be removed. That said, in our experience, having tested a considerable number of airbags, which have been in the field on vehicle for many years, these labels are reasonably robust, and will usually only separate from the airbag when they are deliberately removed. Therefore, we recommend as follows: a) the VIN itself be marked on a paper label of the same kind and quality as the existing serial number label and affixed to the rear or side of the module as appropriate and, b) installers of airbags must ensure that the VIN label and serial number labels are intact before installation.

In our experience, the cost of such a label, the labor to apply it, overhead and profit included should not exceed 15 cents per unit.

12. The demand for airbags is primarily for frontal airbags, not side airbags, roll over curtains or other types. Therefore, marking the VIN on the module need only be required on the driver and passenger side frontal units in our opinion.

Airbags are already regulated by existing federal rules. Because of the pyrotechnic nature of airbag modules they are regulated with respect to transportation (49 CFR) and public safety (27 CFR Part 55). Persons offering airbags for transport or dealing in airbags are required to comply with the various laws (unless formally exempted). Given that these regulations are already in force, it may be more expeditious to ensure the more consistent application and enforcement of existing regulations with respect to airbags.

Sincerely,

Peter Byrne
President,
ATT Inc